

EXHIBIT 6

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

SARA HAWES, individually, and on behalf of
all others similarly situated,

Plaintiff,

v.

MACY'S WEST STORES, INC.,

Defendant.

Case No. 1:17-cv-00754

Judge Timothy S. Black

DECLARATION OF SAL CINIGLIO

I, Sal Ciniglio, declare and state as follows:

1. I am over the age of 18 and under no disability. I have personal knowledge of the matters set forth herein, unless otherwise specifically indicated.

2. I am employed with AQ Textiles, LLC ("AQ Textiles") as the National Accounts Manager. I have held that position since February 2017. Prior to working for AQ Textiles, I worked for Macy's as the buyer for sheets. I was responsible for buying bed sheets that are sold in all Macy's stores, including the Macy's retail stores in California. I held that position between June 2010 and January 2017. I did not have any responsibility for developing or sourcing Macy's private label sheets. When I worked at Macy's, Macy's did not have any role in obtaining test reports for the products purchased from AQ Textiles. Rather, Macy's relied on its suppliers to confirm that products complied with all represented specifications, including thread count.

3. The CVC sheets sold by AQ Textiles to Macy's vary greatly. The thread count on those sheets has ranged from 400 to as high as 1800 threads per square inch.

4. Some of the CVC sheets are sold within a core program meaning that Macy's will order multiple shipments of them over time and some are opportunity buys meaning that the sheets are already packaged and labeled when they are sold to Macy's. I estimate that between 5 and 10% of CVC sheets sold to Macy's are opportunity buys.

5. In my experience, customers look for size, color, and hand feel when purchasing sheets. It is important to convey those things to the customer. The sheets sold to Macy's are in clear plastic bags with zippers allowing customers to look at and feel the sheets.

6. For the core programs, Macy's approves the inserts that are placed into the clear plastic bags containing the sheets. The inserts are designed to convey to the consumer the different attributes that are available in the sheets. The sheets in the different core programs are very different one from the other, and the inserts convey that difference.

7. Attached as exhibits are graphics illustrating the inserts for some of the core programs that Macy's has bought from AQ Textiles from 2013 to the present.

- a. Exhibit A represents the nuPercale insert.
- b. Exhibit B represents the Monaco insert.
- c. Exhibit C represents the Somerset insert.
- d. Exhibit D represents the Belvedere insert.
- e. Exhibit E represents the Sydney insert.
- f. Exhibit F represents the Celliant insert.
- g. Exhibit G represents the Fairfield Square insert.
- h. Exhibit H represents the Optimal Performance insert.
- i. Exhibit I represents the Grayson insert.
- j. Exhibit J represents the Whitney insert.

k. Exhibit K represents the Bradford insert.

l. Exhibit L represents the Parker insert.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 30, 2021.


Sal Ciniglio 4/30/21

EXHIBITS A-L

(UNDER PROVISIONAL SEAL)